

## **REMARKS**

### **Status of the Claims**

- Claims 1-8 and 10-15 are pending in the Application.
- Claims 1-8 and 10-15 stand rejected.
- Claims 1 and 10 are currently amended by Applicant.

### **Supplemental Amendment**

This amendment replaces the amendment of the RCE submission filed on October 31, 2007, which has not yet been entered or examined. The content of this amendment is similar the RCE submittal filed on October 31, 2007, except that clarifying amendments are made to independent Claims 1 and 10. Please disregard the claim amendments in the submission of October 31, 2007 and replace with the claim amendments offered herein.

### **Claim Rejections Pursuant to 35 U.S.C. §103**

Claims 1-2, 5-7, 10-12, and 14-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. Ser. No. 6,957,214 to Silberberg et al. (Silberberg) in view of U.S. Pat. Ser. No. 7,120,645 to Manikutty et al. (Manikutty). Applicant respectfully traverses the rejection.

Applicant amends independent Claims 1 and 10 to include the aspect that utilization of the intermediate language representation, when used in a system having M front-front end languages and N back-end search engines, has a complexity of M plus N compiler implementations. Applicant finds support for this amendment in Figure 2 and paragraphs 0019 and 0037 of the as-filed specification.

Applicant amends Claim 1 to include the aspect that the application programming interfaces (APIs) share a common data model which is the operators of the graph structure of

the XML intermediate language representation. Applicant finds support for the amendment in 0018 and 0038 of the as-filed specification.

Silberberg discloses:

“A system for accessing information from data sources. A user domain translates queries from users and applications for recognition by an aggregation domain, receives responses from the aggregation domain, and translates the responses for recognition by the users and applications. An aggregation domain receives translated queries from the user domain, translates the queries for recognition by a data source domain, receives responses from the data source domain, translates the responses for recognition by the user domain, and transmits the translated responses to the user domain. A data source domain receives the translated queries from the aggregation domain, identifies data sources to receive the queries, translates the queries to the data sources, receives responses from the data sources, translates the responses, and transmits the translated responses to the aggregation domain. A knowledge base the domains use to automatically function includes data models and conceptual terminology translations.” (Silberberg, Abstract)

Applicant respectfully submits that Silverberg fails to teach the aspect that utilization of the intermediate language representation, when used in a system having M front-front end languages and N back-end search engines, has a complexity of M plus N compiler implementations as recited in amended Claims 1 and 10. Also, Silverberg fails to teach the aspect that the application programming interfaces (APIs) share a common data model which is the operators of the graph structure of the XML intermediate language representation as recited in amended Claim 1.

Manikutty at col. 5, lines 13-25 teaches a technique for executing database commands that involve operations on XML constructs includes receiving the database command. It is then determined whether an XML component operation in the database command can be transformed to a relational database operation, which operates on a particular set of one or

more relational database constructs, and which does not involve the XML component operation. If it is determined that the XML operation can be transformed, then the XML component operation is rewritten to a particular relational database operation that does not involve the XML component operation. The particular relational database operation on the particular set of one or more relational database constructs is evaluated. (see col. 5, lines 13-25).

However, Manikutty, like Silberberg, fails to teach the aspect that utilization of the intermediate language representation, when used in a system having M front-front end languages and N back-end search engines, has a complexity of M plus N compiler implementations as recited in amended Claims 1 and 10. Also, Manikutty fails to teach the aspect that the application programming interfaces (APIs) share a common data model which is the operators of the graph structure of the XML intermediate language representation as recited in amended Claim 1.

Since both Silberberg and Manikutty, considered separately or combined, fail to teach or suggest all of the elements of the amended independent Claims 1 and 10 as described above, then the combination of Silberberg and Manikutty cannot render obvious amended independent Claims 1 and 10 under 35 U.S.C. §103(a) per MPEP §2143.03 because all claim limitations are not taught by the combination.

Accordingly, Applicant submits Claims 1-8 and 10-15 patentably define over the cited art. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of independent Claims 1 and 10 and their respective dependent claims.

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**PATENT**

**Conclusion**

In view of the above remarks and amendments, Applicant respectfully requests withdrawal of the present rejections and reconsideration of the pending claims as they patentably define over the cited art.

Respectfully submitted,

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